

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MAHMOOD HUSSAIN SHAH

Defendant.

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Crim. No. MJG-16-430

GOVERNMENT'S OMNIBUS PRETRIAL CONFERENCE FILING

The United States of America, through undersigned counsel, hereby provides the following statement regarding the Court's proposed Voir Dire and Preliminary Instructions, as well as the following response to the Defendant's Request for Discovery:

I. PROPOSED VOIR DIRE AND PRELIMINARY INSTRUCTIONS

The Government agrees with the Court's proposed Voir Dire Statement and Questions, or to the Court's Preliminary Instructions, with one exception: the Government proposes the Court instruct the jury that the trial is expected to last five to six days, rather than three to four days.

The Government proposes one additional Voir Dire Question be added to those proposed by the Court:

"Do any of you have any attitudes or feelings with regard to persons of other races, religions, or ethnic backgrounds that might make it more difficult for you to serve fairly and impartially as a juror in this case?"

II. RESPONSE TO THE DEFENDANT'S DISCOVERY REQUEST

After the Defendant filed his Request for Discovery (Doc. 85), defense counsel signed a standard discovery agreement, a copy of which is attached to this filing. *See* Attachment A. The discovery agreement provides, in part, that the Government will comply with Rule 16, provide *Brady* and *Giglio* materials if and when discovered, and will provide *Jencks* materials one week